

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LARRY PHILPOT,
Plaintiff,

- against -

IHEARTMEDIA, INC.
Defendant.

Case no: 1:16-cv-09156-AJN

**DECLARATION IN
SUPPORT OF MOTION TO
WITHDRAW AS COUNSEL**

I, Yekaterina Tsyvkin hereby declare the following:

1. I am a member of the bar of this Court and an associate at Liebowitz Law Firm LLP. I respectfully submit this Declaration upon personal knowledge in support of the motion (the "Motion") of Liebowitz law Firm PLLC to withdraw as counsel of record for Plaintiff Larry Philpot.
2. I represent the Plaintiff in the matter and am fully familiar with all facts presented here.
3. This matter was filed in the Court on November 24, 2016.
4. After repeated attempts to reach my client, there has been no communication between Plaintiff and Counsel.
5. It has become impossible to continue to represent the Plaintiff's interest.
6. Liebowitz Law Firm LLP has no charging lien.
7. Pursuant to Local rule 1.4, I have caused to be served an electronic copy of the Motion, and the Declarations thereto, upon my Plaintiff via electronic mail, at Larry@behindthemusic.net and the Defendant on February 8, 2017.
8. For the reasons set forth herein, I respectfully request for leave to withdraw as counsel.

Dated: Valley Stream, New York
February 8, 2017

Respectfully submitted,

Liebowitz Law Firm, PLLC

By: /s/Yekaterina Tsyvkin
Yekaterina Tsyvkin

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